In The Supreme Court of the United States

JEFFREY ALAN OLSON,

Petitioner,

v.

COMMONWEALTH OF PENNSYLVANIA,

Respondent.

On Petition for a Writ of Certiorari to the Supreme Court of Pennsylvania

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, David T. Leake, hereby certify that I am a member of the bar of this Court, and that the document contains 2,306 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: May 20, 2020 /s/ David T. Leake__

David T. Leake

Counsel of Record for

Petitioner Jeffrey Alan Olson